

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

NATALIE BRADLEY

Plaintiff,

v.

No. 24-CV-00497 MLG/GJF

NEW MEXICO HIGHLANDS UNIVERSITY,
BOARD OF REGENTS OF NEW MEXICO
HIGHLANDS UNIVERSITY (A/K/A THE
BOARD OF REGENTS OF NEW MEXICO
NORMAL UNIVERSITY), GLORIA GADSDEN,
and JILL DIAMOND,

Defendants.

**DEFENDANTS' MOTION FOR EXTENSION TO ANSWER PLAINTIFF'S
SECOND AMENDED COMPLAINT**

COME NOW Defendants Board of Regents of New Mexico Highlands University, Gloria Gadsden and Jill Diamond by and through their counsel, Allen Law Firm, LLC (Michelle Lalley Blake), and respectfully request a one week extensions to file their respective answers to Plaintiff's Second Amended Complaint. Attempts were made to determine whether the instant motion was opposed pursuant to D.N.M.LR-CIV 7.1(a), but as of the time of this submission, no response had been received. In support of this Motion, Defendants state as follows:

1. Plaintiff filed her First Amended Complaint as of right on May 27, 2024 (Doc. 4);
2. Prior to answering the First Amended Complaint, Defendants submitted a Motion to Dismiss and Alternatively for a More Definite Statement on July 26, 2024 (Doc. 6);
3. The Motion to Dismiss was set for hearing on January 29, 2025;
4. Prior to the hearing, Plaintiff Alvarez voluntarily dismissed her claims against all Defendants (Doc. 18);

5. Subsequent to the January 29, 2025 hearing, the Court entered an Order Granting Defendants' Motion in Part and Denying in Part (Doc. 21). Pursuant to the Order, Plaintiff was required to amend her Complaint;

6. Plaintiff's Second Amended Complaint was filed on February 21, 2025 (Doc. 22);

7. If required to answer the original Complaint (Doc. 1) or the First Amended Complaint, Defendants would have had 21-days to do so. Fed.R.Civ.P. 12(A)(i). Although no answers have been filed, because Defendants are responding to a Second Amended Complaint, Defendants presume the time to do so is governed by Fed.R.Civ.P. 15(a)(3) which allows only 14 days to answer;

8. The Second Amended Complaint is lengthy and contains specific factual averments and legal claims against the separate Defendants. Thus, due to the manner in which the Second Amended Complaint was plead and the legal claims asserted, a separate answer on behalf of each Defendant is necessary;

9. Additional time is necessary to prepare separate answers for each Defendant;

10. Defendants request a short extension of one week, until March 14, 2025, to submit their respective answers to the Second Amended Complaint.

WHEREFORE, Defendants respectfully request the due date to answer the Second Amended Complaint be extended by one week from March 7, 2025 to March 14, 2025.

Respectfully submitted,

/s/ Michelle Lalley Blake
 Michelle Lalley Blake
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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March 2025, I caused the foregoing to be filed electronically through the federal CM/ECF filing system, which caused all parties of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing, as follows:

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/s/ Michelle Lalley Blake

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